

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

NEW GEORGIA PROJECT, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of the State of Georgia, *et al.*

Defendants.

Civil Action No. 1:24-cv-03412-SDG

**DEFENDANTS' JOINT MOTION FOR EXTENSION OF TIME TO
RESPOND TO MOTION TO CERTIFY DEFENDANT CLASS**

Defendants in this matter, including all County Defendants,¹ State Defendants,² and Intervenor Defendants,³ jointly request that this Court grant an extension of the current deadline for Defendants to respond to Plaintiffs' Motion to Certify Defendant Class [Doc. 319] until **July 22, 2025**. This motion is unopposed by the Plaintiffs who filed the motion, which are Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda,

¹ County Defendants are the election boards and the individual members of the election boards in Chatham, Forsyth, Fulton, Macon-Bibb, Gwinnett, Spalding, Cobb, Richmond, Cherokee, Columbia, Dekalb, Dougherty, Hall, Lee, Lowndes, Whitfield, and Worth counties.

² State Defendants are Georgia Secretary of State Brad Raffensperger and the members of the Georgia State Election Board.

³ Intervenor Defendants are the Republican National Committee and Georgia Republican Party, Inc.

VoteRiders, and Secure Family Initiatives (“Moving Plaintiffs”). All Defendants join this request.

The unforeseen circumstance that necessitates an extension to the response deadline is that undersigned counsel for putative class representatives Gwinnett County Defendants has previously planned family travel that interferes with the current deadline. *See* Notice for Leave of Absence [Doc. 303], filed May 15, 2025, *see also* [Docs. 139, 158, 320, 322, 323, 324, and 325] (Notices of Leave of Absences with travel in late May, June, and July for counsel for other Defendants). That circumstance was not foreseen because, while Gwinnett County Defendants were made aware in early April that Moving Plaintiffs would be moving for certification of a class of defendants sooner rather than later, Gwinnett County Defendants were not aware of when Moving Plaintiffs would file their motion.

An extension of Defendants’ response deadline to July 22, 2025 would not prejudice Moving Plaintiffs or slow down the administration of this case. If Defendants’ file their responses on July 22, Moving Plaintiffs’ reply brief would be due on August 5, 2025,⁴ meaning that the class certification issue will be fully briefed and submitted to the Court likely prior to all Defendants filing

⁴ Should Moving Plaintiffs’ desire an extension of their time to reply, Defendants would certainly consent to it.

Answers, and well before the timeline contemplated in the initial Scheduling Order [Doc. 142].

Therefore, Defendants jointly request an extension of their deadline to respond to Plaintiffs' Motion to Certify Class of Defendants until **July 22, 2025**.

Respectfully submitted this 10th day of June, 2025.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned certifies that the foregoing Brief has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ C. Ryan Germany
C. Ryan Germany

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.1, I hereby certify that on this day I electronically filed the above **DEFENDANTS' JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION FOR CERTIFICATION OF DEFENDANT CLASS** with the Clerk of Court using the CM/ECF system which will automatically send e-mail notifications of such filing to all attorneys of record.

Dated: June 10, 2025

/s/ C. Ryan Germany
C. Ryan Germany